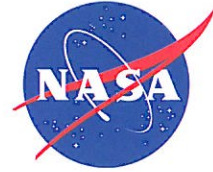


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001

November 26, 2012



Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the American Astronautical Society's (AAS) Reception and Screening of a Documentary, "Saving Hubble" on November 26, 2012.

On November 26, 2012, the American Astronautical Society, a non-profit organization under section 501(c)(3) of the Internal Revenue Code, will host a reception and screening of the documentary "Saving Hubble." This event will take place at the U.S. Navy Memorial Heritage Center in Washington, D.C., from 7 pm to 9 pm.

As host, AAS controls the invitations and defrays all costs. Co-sponsors include Lockheed Martin and Ball Aerospace and Technologies. Approximately 300 are expected to attend. The estimated cost of the event including all food and beverages is \$25 per person. The event will be attended by representatives from the U.S. legislative branch, other Federal agencies, the aerospace industry, academia, space advocacy groups, professional associations, and the media. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Accordingly, NASA employees – including non-career appointees in positions for which they are required to sign an ethics pledge under Executive Order 13490 – whose duties do not substantially affect the event sponsors may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect both event co-sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor. Moreover, we understand that the private co-sponsors may hand out gift items of minimal value worth less than \$20. Non-career employees may only accept such items if they reimburse the donor the value of these gifts.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone